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July 8, 2011

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VIA ECF

Honorable Faith S. Hochberg,
United States District Judge
District of New Jersey
Martin Luther King, Jr. Federal Building
U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Philadelphia Indemnity Ins. Co. v. Khubani Enterprises, Inc., et al.
Docket No. : 11-cv-01281 (FSH) (MAS)
KBR File No. : 435.125

Dear Judge Hochberg:

We represent Third-Party Defendant/Fourth-Party Plaintiff, DeMonaco Agency, Inc. in the above-referenced matter. On July 6, 2011, Fourth-Party Defendant, Pacific Merrill Assurance Brokers, LLC ("Pacific") filed a motion to dismiss the Fourth-Party Complaint pursuant to F.R.C.P. 12(b)(6). Pacific's motion is returnable on August 1, 2011.

We respectfully invoke the provisions of Local Rule 7.1(d)(5) and request that the return date for the motion be adjourned to August 15, 2011, and request an extension of time to file our opposition papers until July 22, 2011. August 1, 2011

Counsel for Pacific has no objections to our request for an extension. This is our first request for an extension of time to respond to Pacific's motion.

Respectfully submitted,

KAUFMAN BORGEEST & RYAN LLP

Brian M. Sher

cc: All Counsel of Record (Via ECF)

7/8/2011

SO ORDERED:

Hon. Faith S. Hochberg USDC

NEW YORK CITY

WESTCHESTER

LONG ISLAND

NJ NEW JERSEY

LOS ANGELES